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## REMARKS

Claims 1-29 are pending in the application.

In paragraph 3 of the Office Action, it is respectfully submitted that the reasoning is completely overlooking applicant's argument that the proposed combination does not teach or suggest a method for operating user equipment (UE) in a telecommunications network for receiving packets during a packet service mode, wherein the user equipment (UE) is entered into a discontinuous reception mode when receiving packets during the packet service mode, as recited in claim 1, since neither cited reference even remotely teaches or suggests this feature which is the whole thrust of the claimed invention.

In Dent, the receiver is not powered down during a packet service mode, which the reasoning recognizes in the paragraph bridging pages 6-7 of the Office Action.

In Abbadessa, the MS 106 powers down when in its idle mode, but does not do so during a packet service mode when receiving one or more packets.

It is respectfully submitted that since neither cited reference teaches or suggests powering down during the packet service mode when receiving one or more packets, which is the whole thrust of the claimed invention, the proposed combination cannot, and does not, result in the claimed invention.

In response to the points made in paragraph 1 of the Office

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Action, which are appreciated by the undersigned attorney, it is respectfully submitted that applicant's arguments are not based on attacking the cited references individually, but instead are based on that disclosed in the cited references *as a whole*, which is consistent with the reasoning set forth in In Re Keller, 208 USPQ 871 (Fed. Cir. 1986). For example, in order to end up with the claimed invention, one of ordinary skill in the art would have to first be motivated to combined the two cited references in the manner proposed, then be further motivated to further modify the proposed combination so that the powering down is done during the packet service mode instead of the idle mode as taught in Abbadessa. It is respectfully submitted that nothing on the record suggests why one of ordinary skill in the art would be motivated to combined the cited references in the manner proposed, then be further motivated to further modify the proposed combination in order to end up with the claimed invention. It is respectfully submitted that nothing on the record, including that disclosed in Dent or Abbadessa when viewed as a whole, suggests why one of ordinary skill in the art would be motivated to combined the cited references in the manner proposed, or why one of ordinary skill in the art would be motivated to make the further modification thereto, especially when neither cited references *as a whole* even remotely suggests the whole thrust of the claimed invention. For these reasons, it

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is respectfully submitted that the patent application itself is the only source of such motivations on the record, which is nothing more than hindsight reconstruction.

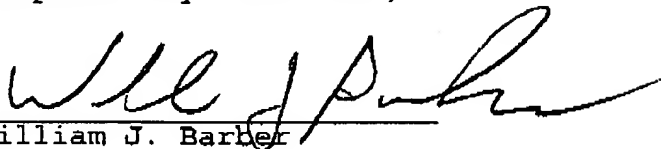
Dependent claims 2-5, 7, 9-10, 12 15-16 and 21 and 26 are similarly rejected based on the proposed combination alone or further in combination with Vembu. Since these claims all contain the aforementioned limitations of the main claim from which they depend, they are believed patentable for the reasons set forth above. Moreover, it is respectfully submitted that Vembu does not make up for the deficiency in teaching of the proposed combination in relation to the point of novelty of the claimed invention.

The remaining claims 6, 8, 11, 13-14, 17-20 and 27-29 are indicated to allowable.

#### Conclusion

For all these reasons, reconsideration and early allowance of all the claims is respectfully requested.

Respectfully submitted,

  
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WJB/bb